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PATRICK E. DUFFY, CLERK

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CLERK OF DISTRICT COURT
GREAT FALLS, MONT.

2009 MAR 30 PM 3:28

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DEPUTY

MONTANA EIGHTH JUDICIAL DISTRICT COURT, CASCADE COUNTY

MICHAEL CARLSTROM,

Plaintiff,

-vs-

TITLE CASH OF MONTANA, INC.,
and EZ TITLE PAWN, INC.,

Defendants.

CV-09-42-6F SEH

Cause No. CDV-09- 416

COMPLAINT AND JURY DEMAND

~~KENNETH R. NEILL~~

THOMAS M. MCKITTRICK

COMES NOW the Plaintiff, and for his cause of action against Defendants, alleges and complains as follows:

1. At all times relevant to the allegations contained herein, Plaintiff was employed by Defendants in Cascade County, among other locations.
2. On or about September 19, 2008, Defendants terminated Plaintiff's employment.
3. Defendants' termination of Plaintiff's employment was wrongful pursuant to Montana's Wrongful Discharge from Employment Act, Sections 39-2-901 et seq.
4. Defendants' termination of Plaintiff's employment was wrongful because the discharge was not for good cause and Plaintiff had completed Defendants' probationary period of employment.
5. Defendants' termination of Plaintiff's employment was wrongful because Defendants

COMPLAINT AND JURY DEMAND

violated the express provisions of their own written personnel policies.

6. Defendants' termination of Plaintiff's employment was wrongful because Defendants terminated plaintiff's employment for refusing to violate public policy.

7. Plaintiff is entitled to recover from Defendants lost wages and fringe benefits for a period not to exceed four (4) years from the date of his discharge, together with interest thereon.

8. Defendants also failed to reimburse plaintiff, or indemnify him from, out of pocket expenses incurred during his employment.

9. Plaintiff is entitled to recover said expenses from defendants.

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For lost wages and fringe benefits for a period not to exceed four (4) years from the date of discharge, together with interest thereon, and for punitive damages, if applicable.

2. For reimbursement and/or indemnification of expenses incurred during plaintiff's employment.

3. For plaintiff's costs and disbursements incurred herein.

4. For such other and further relief as to the Court may seem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact raised in these proceedings.

DATED this 30th day of March, 2009.

THOMPSON, POTTS & DONOVAN, P.C.

By Steven T Potts

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(Attorneys for Plaintiff)